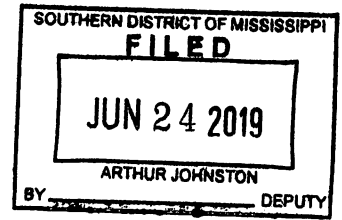


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION



UNITED STATES OF AMERICA

CRIMINAL NO. 2:19-cr-32-KS-MTP

v.

GRAHAM WILLIAMSON

42 U.S.C. § 3631
18 U.S.C. § 844(m)

The United States Attorney charges:

COUNT 1

That on or about October 24, 2017, in Covington County in the Eastern Division of the Southern District of Mississippi, the defendant, **GRAHAM WILLIAMSON**, and others known to the United States, aided and abetted by one another, attempted to and did, by force and threat of force, willfully injure, intimidate, and interfere with African-American residents of the Keys Hill area of Seminary, Mississippi, including victim M.H., by the use and attempted use of fire, because of the race and color of the African-American residents, including M.H., and because the African-American residents, including M.H., were occupying a dwelling in the Keys Hill area of Seminary, Mississippi.

All in violation of Title 42, United States Code, Section 3631(a), and Title 18, United States Code, Section 2.

COUNT 2

That beginning on a date unknown to the United States, and continuing to on or about October 24, 2017, in Covington County in the Eastern Division of the Southern District of Mississippi, the defendant, **GRAHAM WILLIAMSON**, and others known to the United States, knowingly and willfully conspired and agreed to commit an offense in violation of Title 18,

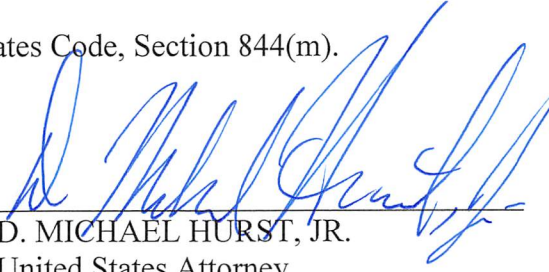
United States Code, Section 844(h), that is, to knowingly use fire to commit a felony prosecutable in a court of the United States: Interference with Housing Rights in violation of Title 42, United States Code, Section 3631, as charged in Count One of the Information.

The object of the conspiracy was accomplished, in substance, by the defendant, **GRAHAM WILLIAMSON**, and others known to the United States, constructing a cross to burn at and near the dwellings of African-American residents of the Keys Hill area of Covington County, Mississippi. In furtherance of the conspiracy and to accomplish the object of the conspiracy, on or about the listed dates, the defendant **GRAHAM WILLIAMSON**, and others known to the United States, committed various overt acts within the Eastern Division of the Southern District of Mississippi, and elsewhere, including, but not limited to, the following:

1. On October 24, 2017, the defendant, **GRAHAM WILLIAMSON**, agreed with a co-conspirator to burn a cross at and near the Keys Hill area, with the intention of intimidating and frightening victim M.H. and other African-American residents of the Keys Hill area.
2. On October 24, 2017, the defendant, **GRAHAM WILLIAMSON**, traveled to the co-conspirator's residence in Seminary, Mississippi, where the defendant and the co-conspirator built a wooden cross using materials from in and around the co-conspirator's residence.
3. On the evening of October 24, 2017, the defendant, **GRAHAM WILLIAMSON**, drove with the co-conspirator to the Keys Hill area, transporting the constructed wooden cross as well as materials to ignite and burn the cross.

4. On the evening of October 24, 2017, the, defendant, **GRAHAM WILLIAMSON**, and the co-conspirator planted the cross they had built in the grass beside Highway 535, in between two driveways that access Keys Hill and M.H.'s residence.
5. On the evening of October 24, 2017, the defendant, **GRAHAM WILLIAMSON** and the co-conspirator successfully lit the cross on fire.

All in violation of Title 18, United States Code, Section 844(m).



D. MICHAEL HURST, JR.
United States Attorney

ERIC DREIBAND
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Civil Rights Division